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**February 22, 2022**

**Via ECF**

Hon. Steven I. Locke, USMJ  
United States District Court, EDNY  
100 Federal Plaza, Courtroom 1020  
Central Islip, New York 11722

**Re: Batten v. Northshore Motor Leasing LLC et. al.**  
**Case #: 21-CV-02558 (DRH)(SIL)**  
**Motion for Extension of Time to Complete Mediation**

Dear Magistrate-Judge Locke:

My firm represents plaintiff in the above-referenced action, and I respectfully write to request a 60-day extension of the February 22, 2022 deadline to complete mediation. Since the last request for an extension of time, which was due to medical reasons on the defense side I have reached out to defense counsel who said he is now able to proceed with the mediation. A corresponding 60-day adjournment of the March 9, 2022 conference is also requested. We do not anticipate the need for any further extensions. Two prior requests for an extension of these deadlines were made and granted.

We thank the Court in advance for its time and consideration.

Respectfully Submitted,

Abdul Hassan Law Group, PLLC

/s/ Abdul Hassan  
By: Abdul K. Hassan, Esq. (AH6510)  
*Counsel for Plaintiff*

**Cc: Defense Counsel via ECF**